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August 7, 2023

Hon. Barbara C. Moses, U.S.M.J.
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007
VIA ECF

MEMO ENDORSED

Re: Leitch et al. v. Amazon Services Com LLC
SDNY Docket No.: 22-cv-06121- BCM

Dear Judge Moses,

I represent Plaintiffs in this matter. This is a joint request for an extension of time for the parties to file a proposed discovery plan from today to Monday, August 14, 2023. This is the second request of this type, the first one having been granted for good cause. There is no prejudice to any party.

As we previously advised Your Honor, the scope of discovery as well as the scope of Plaintiffs' pending motion to compel discovery rest in large part on a discussion between Plaintiffs' computer expert and Defendants' technical people. Counsel for both sides had a meet and confer session last week to discuss this possibility and are attempting to schedule such a conference between the technical people for some time this week. Afterwards, counsel will need to confer again to discuss the parties' respective positions. We believe that this additional delay will result in savings of time and judicial resources in the end. We believe that we should be ready to file the discovery plan within a week, that is by August 14, 2023.

Wherefore, the parties respectfully request that Your Honor permit them to file a proposed discovery plan by Monday, August 14, 2023.

Respectfully submitted,

/s/ Robert Wisniewski
Robert Wisniewski

cc: All counsel of record via ECF

Application GRANTED. No later than August 14, 2023, the parties shall also file "a letter updating the Court on the status of the specific discovery issues that are the subject of plaintiffs' June 27, 2023 letter (Dkt. 90), and whether the parties still require the Court's assistance to resolve any of those issues." (Dkt. 106.) SO ORDERED.



August 8, 2023

Barbara Moses
United States Magistrate Judge